

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
Remarkable Healthcare of Carrollton, LP *et al.* §  
Debtor(s). § Case No. 24-40605

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**MOTION FOR EMERGENCY HEARING REGARDING:**

**(1) EMERGENCY MOTION TO (I) APPROVE INTO DEBTOR POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF (DOCKET NO. 32)**

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**TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:**

KRS Dallas LLC, KRS Fort Worth LLC, KRS Fort Worth LLC, and Kilgore Property Management LLC (collectively, "Kilgore") this *Motion for Emergency Hearing* and in support thereof would show the Court the following.

1. **Underlying motions.** *Emergency Motion to (I) Approve Debtor In Possession Credit Agreement, (II) Grant Priming Liens Under Code Sec. 364(d), and (III) Obtain Related Relief* (Docket No. 32)
2. **Basis for expedited consideration.** To secure the funding of payroll as discussed in proceedings in these cases on March 25, 2024.
3. **Certificate of Conference.** Not applicable under the circumstances.
4. **Time estimate for hearing.** Sixty (60) minutes or less.
5. **Deadline for when hearing is needed:** A hearing should occur at **1:00 p.m on**

**March 26, 2024.**

6. **Affidavit to support emergency.** Kilgore would ask that the emergency hearing affidavit requirement be waived and that the Court take judicial notice of the proceedings of March 25, 2024.

7. A proposed form of order accompanies this motion.

*{continued on following page}*

Dated: March 26, 2024

Respectfully submitted:

WEYKER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN: 24001846)

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ATTORNEYS FOR

KRS DALLAS LLC, KRS FORT WORTH LLC, KRS  
FORT WORTH LLC, AND KILGORE PROPERTY  
MANAGEMENT LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on March 26, 2024 (1) by electronic notice to all ECF users who have appeared in this case to date (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility. *A separate certificate of service with copies of this lists will be filed.*

/s/ Jeff Carruth

JEFF CARRUTH

**ECF NOTICE LIST**

**24-40605 Notice will be electronically mailed to:**

Elizabeth Nicolle Boydston on behalf of Debtor Remarkable Healthcare of Carrollton, LP  
[lboydston@gutnicki.com](mailto:lboydston@gutnicki.com)

Lynn Hamilton Butler on behalf of Creditor Alleon Capital Partners, LLC  
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Jeff Carruth on behalf of Creditor KRS Carrollton, LLC  
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Jeff Carruth on behalf of Creditor Kilgore Property Management LLC  
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Julie Anne Parsons on behalf of Creditor The County of Denton, Texas  
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Julie Anne Parsons on behalf of Creditor The County of Guadalupe, Texas  
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Alexandria Rahn on behalf of Debtor Remarkable Healthcare of Carrollton, LP  
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Whitney Tharpe on behalf of Creditor United States Department of Health and Human Services  
[whitney.tharpe@usdoj.gov](mailto:whitney.tharpe@usdoj.gov), [guadalupe.garcia@usdoj.gov](mailto:guadalupe.garcia@usdoj.gov)

John Kendrick Turner on behalf of Creditor City of Carrollton  
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John Kendrick Turner on behalf of Creditor Dallas County  
[john.turner@lgbs.com](mailto:john.turner@lgbs.com), [Dora.Casiano-Perez@lgbs.com](mailto:Dora.Casiano-Perez@lgbs.com);Dallas.Bankruptcy@lgbs.com

John Kendrick Turner on behalf of Creditor Lewisville ISD  
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US Trustee  
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**REGULAR MAIL LIST / MATRIX**

Mailing matrix to be supplied

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE: §  
Remarkable Healthcare of Carrollton, LP *et al.* §  
Debtor(s). §

Case No. 24-40605

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**ORDER GRANTING MOTION FOR EMERGENCY HEARING  
REGARDING:**

**(1) EMERGENCY MOTION TO (I) APPROVE INTO DEBTOR  
POSSESSION CREDIT AGREEMENT, (II) GRANT PRIMING LIENS  
UNDER CODE SEC. 364(D), AND (III) OBTAIN RELATED RELIEF  
(DOCKET NO. 32)**

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**IT IS THEREFORE ORDERED THAT the Court shall conduct an emergency  
hearing on the DIP Motion (DOCKET NO. 32) ON MARCH 26, 2024, AT 1:00 P.M.**

Dated: \_\_\_\_\_

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THE HONORABLE BRENDA. T. RHOADES  
UNITED STATES BANKRUPTCY JUDGE